

Declaration #1, #2 and #3.

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CASE No. 2:18-CV-158

Fred G. Martinez

v.

NUECES County Sheriff

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Fred G. Martinez  
TDCJ#2061834,  
Plaintiff.

COPY

#1

Declaration of  
Ruben Ramos

CASE NO. 2:18-CV-158

NUECES Cty. Sheriff's Office/Jail,  
and Sheriff Jim Kaelin, and all  
Booking Deputies under his command.

### Declaration of Oath

On or About March 20 2011, I, Ruben Ramos,  
TDCJ#01723401, SID# \_\_\_\_\_, was incarcerated in  
the Nueces County Jail.

During the Booking process at this facility, I experienced  
multiple foul actions exercised by Nueces County Deputies assigned  
in the Booking Department. THESE bad acts include:

- (1) Imprisoned in an unauthorized holding cell in the harsh confines  
of the basement of the Nueces County Jail, referred to by  
inmates as "The Dungeon".
- (2) Deprived of:
  - (a) phone privileges
  - (b) commissary
  - (c) law library
  - (d) necessities
  - (e) adequate food
  - (f) showers
- (3) Excess of the 48-hrs time limit to process.

I, Ruben Ramos, in the TDCJ-Stiles Unit,  
declare under penalty of perjury that the foregoing instrument  
is true and correct.

Executed on the 16<sup>th</sup> day of May, 2018.

R. G. Ramos TDC# 01723401  
Declarer

Fred G. Martinez  
TDCJ# 2061834,  
Plaintiff.

Nueces Cty. Sheriff's Office / Jail,  
and Sheriff Jim Kaelin, and All  
Booking Deputies under his command.

#2  
Declaration of  
Robert Garcia

CASE NO. 2:18-cv-158

### Declaration of Oath

On or about September 17, 2015 I, Robert Garcia,  
TDCJ# 27079822 - SID # 10122327, was incarcerated in  
the Nueces County Jail.

During the Booking Process at this facility, I experienced  
multiple foul actions exercised by Nueces County Deputies assigned  
to the Booking Department. THESE bad acts include:

- (1) JAILED in AN UNAUTHORIZED holding cell in the harsh confines of  
the basement of the Nueces County Jail, referred to by inmates  
as "the Dungeon."
- (2) DEPRIVATION of:
  - (a) PHONE PRIVILEGES
  - (b) COMMISSARY
  - (c) LAW LIBRARY
  - (d) NECESSITIES
  - (e) ADEQUATE food
  - (f) SHOWERS
- (3) EXCESS of 48-hes time-limit to process.

I, Robert Garcia, in the TDCJ- Stiles Unit,  
declare under penalty of perjury that the foregoing instrument  
is TRUE AND CORRECT.

Executed on the 10<sup>th</sup> day of May, 2018.

R.G.  
Declarer

Fred G. Martinez  
TDCJ # 2061834,  
Plaintiff.

NUECES Cty. Sheriff's Office/Jail,  
and Sheriff Jim Kaelin, and all  
Booking Deputies under his command.

#3  
DECLARATION OF  
Jesca Rodriguez

CASE NO.: 2:18-cv-158

### Declaration of Oath

On or about 12-15

TDCJ # 1985545 - SID# \_\_\_\_\_

I, Jesca Rodriguez,

, was INCARCERATED in

the NUECES County Jail.

During the Booking Process at this facility, I experienced multiple foul actions exercised by NUECES County Deputies assigned to the Booking Department. THESE BADS acts include:

(1) JAILED in an UNAUTHORIZED holding cell in the harsh confines of the basement of the NUECES County Jail, refered by inmates AS "The Dungeon."

(2) DEPRIVATION of: (a) phone privileges  
(b) commissary  
(c) law library  
(d) necessities  
(e) adequate food  
(f) showers

(3) EXCESS of 48-hr time-limit to process.

I, Jesca Rodriguez, in the TDCJ- Stiles Unit, declare under penalty of perjury that the foregoing instrument is true and correct.

Executed on 10th day of May, 2018.

Jesca Rodriguez  
DECLARER